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Ms. Marlene H. Dortch
December 21, 2004
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that the parallel process of making our broadcast and cable programming compliant will similarly require considerable time, since we frequently re-use existing material that may contain non-compliant references to our websites.

For these reasons, we requested that the effective date of the new rules be deferred to January 1, 2006, consistent with the effective date of many of the other requirements in the recently-released FCC decision. We indicated that our respective companies would commit to working with the Commission and other interested parties, beginning early in 2005, to craft clear and workable solutions to the agency's concerns regarding children's website promotions, but that until these issues have been resolved and precise regulatory boundaries have been established, the process of redesigning our companies' websites cannot effectively be undertaken.

Pursuant to FCC Rule 1.1206, an original and one copy of this filing are being submitted to the Secretary.

Respectfully submitted,

Barbara K. Gardner

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cc: Commissioner Kevin J. Martin
Monica Desai